

**REMARKS**

Claim 13 was objected to as being a substantial duplicate of claim 7. By this Amendment, claim 13 has been amended to clarify the recited subject matter. Applicant submits that the amended claim 13 is not a substantial duplicate of claim 7; thus, the objection should be withdrawn.

Claims 1-6, 8-10 and 12 were rejected under 35 U.S.C. 102(e) as being anticipated by Coyne et al. (U.S. 5,943,619; hereafter "Coyne"). Claims 7, 11, and 14 were rejected under 35 U.S.C. 103(a) as being unpatentable over Coyne in view of Karlsson et al. (U.S. 6,222,829; hereafter "Karlsson"). Applicant traverses each of these rejections because Coyne, analyzed individually or in combination with Karlsson, fails to disclose, teach or suggest all the features recited in the rejected claims.

For example, Coyne, analyzed individually or in combination with Karlsson, fails to disclose, teach or suggest, a method of registration, the method including "the home location register maintaining an access parameter which indicates whether the mobile subscriber is entitled to use the first network, the second network or both networks. . .", as recited in rejected independent claim 1 and its dependent claims 3-4 and 6-7. Similarly, Coyne, analyzed individually or in combination with Karlsson, fails to disclose, teach or suggest, a method of registration, the method including "storing, in the memory of a mobile station, mobile subscriber data and an access parameter indicating whether the mobile subscriber is entitled to use the first network, the second network or both networks", as recited in rejected independent claim 2 and its dependent claims 5 and 13-14. Finally, Coyne, analyzed individually or in combination with Karlsson, fails to disclose, teach or suggest, a data structure including "an access parameter which indicates whether the mobile subscriber is entitled to use the first network, the second network or both networks", as recited in rejected independent claim 8 and its dependent claims 3-4 and 6-7.

**INDEPENDENT CLAIM 1**

The Office Action referred to the passages of Coyne, at column 5 lines 15 - 35 and column 6 lines 25 - 65, as teaching a home location register maintaining an access parameter which indicates whether a mobile subscriber is entitled to use a first network, a second network or both networks. However, in Coyne, it is not the Home Location Register (HLR) that maintains the access parameter indicating which networks the mobile subscriber is entitled to use. Rather, as taught by Coyne, and particularly illustrated by Fig. 3 of Coyne, the HLR is entirely conventional and stores only information indicating the mobile subscriber's

rights in its home Public Land Mobile Network (PLMN) (reference 10A in figure 3). In Coyne, the mobile subscriber's rights in the visited network, PLMN 10B, are stored in the Register R3 260 of the Protocol Enhancer PE 250 and/or the Register R2 280 within the visited Mobile Switching Center/Visitor Location Register MSC/VLR 40. Particularly, as taught at Coyne, column 6, lines 31 – 40,:

The HLR 50 then down-loads the subscriber data associated with the mobile station thereto. Accordingly, another MAP based signal, such as an Insert Subscriber Data signal 105 is originated by the HLR 50 with the necessary subscriber data. As a result, the MAP signal 105 with the associated subscriber data is routed to the PE 250. The application module 270 within the PE 250 then determines which features or services available within the second PLMN 10B are not defined by the subscriber data received from the HLR 50.

Accordingly, one of ordinary skill in the art would understand the expression “the HLR 50 then down-loads subscriber data thereto” to mean that the HLR downloads the data to the protocol enhancer PE (250) in the visited PLMN. The PE 250 then determines which features or services are available to the visiting user.

Thus, the HLR in the Coyne disclosure is a conventional GSM HLR that only stores the subscriber's rights in his/her home network. Information indicating rights in other networks is stored in equipment in the networks in question. Thus, Coyne fails to disclose, teach or suggest a method including “the home location register maintaining an access parameter which indicates whether the mobile subscriber is entitled to use the first network, the second network or both networks. . .”, as recited in rejected independent claim 1 and its dependent claims 3-4 and 6-7. Karlsson fails to remedy this deficiency of Coyne because Karlsson is merely directed to techniques involved in Internet Protocol (IP) telephony networks that are circuit switched or packet switched.

Furthermore, the combined teachings of Coyne and Karlsson fail to disclose teach or suggest a method that includes “the home location register sending the mobile subscriber data and also said access parameter” in response to said message for requesting the subscriber data, as recited in claim 1. Because the HLR in Coyne does not store an access parameter, as recited in claim 1, Coyne cannot possibly disclose, teach or suggest the HLR sending the mobile subscriber data and also the access parameter, as recited in claim 1.

Similarly, because the HLR in Coyne does not send an access parameter, as recited in claim 1, Coyne cannot possibly disclose, teach or suggest a method including “the network element that requested the mobile subscriber data using said access parameter for restricting the access of the mobile subscriber only to the first network or to the second network”, as recited in claim 1. As explained above, in Coyne, the PE 250 is the network element that

requested the mobile subscriber data. Because Coyne's HLR stores information on the subscriber's rights in the home PLMN (i.e., the first network), the network element cannot use the access parameter for restricting ... access ... only to the first network or to the second network. Thus, Coyne fails to disclose teach or suggest a method wherein the network that requested the mobile subscriber data using the access parameter for restricting the access of the mobile subscriber only to the first network or to the second network, as recited in claim 1.

Karlsson fails to remedy this deficiency of Coyne for the above-identified reasons. Thus, independent claim 1 and its dependent claims are patentable over the teachings of Coyne and Karlsson. Therefore, the rejection is traversed.

#### INDEPENDENT CLAIM 2

The Office Action referred to the passages of Coyne, at column 5 lines 20 - 35 and column 6 lines 25 - 67, as teaching storing, in a memory of a mobile station, mobile subscriber data and an access parameter indicating whether a mobile subscriber is entitled to use the first network, the second network or both networks. However, as explained above, this passage does not teach storing an access parameter. In Coyne, the mobile station merely stores (or transmits) an International Mobile Subscriber Identity (IMSI) 140, which arguably corresponds to the mobile subscriber data but not the access parameter of independent claim 2. Thus, Coyne does not teach or suggest a mobile station storing anything beyond a conventional IMSI.

Furthermore, Coyne fails to disclose, teach or suggest a method including a mobile station using its stored access parameter to restrict the access of the mobile subscriber only to the first and/or the second network, as recited in independent claim 2. Because Coyne fails to disclose, teach or suggest storing the access parameter in the memory of a mobile station, it cannot disclose, teach or suggest the mobile station using that access parameter to restrict access.

Karlsson fails to remedy this deficiency of Coyne for the above-identified reasons. Thus, independent claim 2 and its dependent claims are patentable over the teachings of Coyne and Karlsson. Therefore, the rejection is traversed.

#### INDEPENDENT CLAIM 8

The Office Action referred to the passages of Coyne, at column 3, lines 35-53, column 5, lines 20 – 35, column 6, lines 25 – 65 and column 7 lines 10-36 and 60-67, as teaching an access parameter which indicates whether the mobile subscriber is entitled to use the first network, the second network or both networks. However, as explained above, these passages do not disclose teach or suggest the claimed use of an access parameter. As explained above,

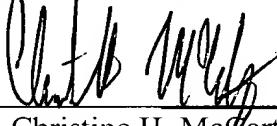
in Coyne, the mobile station merely stores (or transmits) an International Mobile Subscriber Identity (IMSI) 140, which arguably corresponds to the mobile subscriber data but not the access parameter of independent claim 8. However, there is no component in Coyne that corresponds to the claimed access parameter which indicates whether the mobile subscriber is entitled to use the first, second or both networks, as recited in independent claim 8.

Karlsson fails to remedy this deficiency of Coyne for the above-identified reasons. Thus, independent claim 8 and its dependent claims are patentable over the teachings of Coyne and Karlsson. Therefore, the rejection is traversed.

All objections and rejections having been addressed, it is respectfully submitted that the present application is in condition for allowance and a notice to that effect is earnestly solicited. Attached hereto as an Appendix captioned "Version with markings to show changes made" is a marked-up version of the changes made to the claims by the current amendment.

Respectfully submitted,

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CHM

Enclosure: Appendix

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